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*Counsel for SEB Investment Management AB and  
Lead Counsel for the Putative Class*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

SEB INVESTMENT MANAGEMENT AB, and  
WEST PALM BEACH FIREFIGHTERS'  
PENSION FUND, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, CHARLES W.  
SCHARF, KLEBER R. SANTOS, and CARLY  
SANCHEZ,

Defendants.

Case No. 3:22-cv-03811-TLT

**DECLARATION OF STACEY M. KAPLAN  
IN SUPPORT OF PLAINTIFFS' MOTION  
TO CERTIFY CLASS, APPOINT CLASS  
REPRESENTATIVES, AND APPOINT  
CLASS COUNSEL**

Date: April 29, 2025  
Time: 2:00 p.m.  
Location: Ctrm. 9, 19<sup>th</sup> Floor  
Judge: Hon. Trina L. Thompson

1 I, Stacey M. Kaplan, declare as follows:

2 1. I am a member of the Bar of the State of California and a partner at the law firm of Kessler  
3 Topaz Meltzer & Check, LLP, counsel of record for Court-appointed Lead Plaintiff SEB Investment  
4 Management AB (“Lead Plaintiff” or “SEB”) and additional Plaintiff West Palm Beach Firefighters’  
5 Pension Fund (“WPB Fire,” and together with SEB, “Plaintiffs”) in the above-captioned action. I submit  
6 this declaration in support of Plaintiffs’ Motion to Certify Class, Appoint Class Representatives, and  
7 Appoint Class Counsel.

8 2. Attached hereto as **Exhibit 1** is the Expert Report of Joseph R. Mason, Ph.D., dated January  
9 17, 2025.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of a document bearing Bates number  
11 WF\_SEB\_00070794.

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document bearing Bates number  
13 WF\_SEB\_00115755.

14 5. Attached hereto as **Exhibit 4** is a true and correct copy of a document bearing Bates number  
15 WF\_SEB\_00121257.

16 6. Attached hereto as **Exhibit 5** is a true and correct copy of a document bearing Bates number  
17 WF\_SEB\_00072147.

18 7. Attached hereto as **Exhibit 6** is a true and correct copy of a document bearing Bates number  
19 WF\_SEB\_00077800.

20 8. Attached hereto as **Exhibit 7** is a true and correct copy of a document bearing Bates number  
21 WF\_SEB\_00077612.

22 9. Attached hereto as **Exhibit 8** is a true and correct copy of a document bearing Bates number  
23 WF\_SEB\_00077804.

24 10. Attached hereto as **Exhibit 9** is a true and correct copy of a document bearing Bates number  
25 WF\_SEB\_00148888.

26 11. Attached hereto as **Exhibit 10** is a true and correct copy of a document bearing Bates  
27 number WF\_SEB\_00182260.



1 knowledge.

2 Executed: January 17, 2025, at San Francisco, California.

3  
4 /s/ Stacey M. Kaplan

Stacey M. Kaplan

5 KESSLER TOPAZ

6 MELTZER & CHECK, LLP

7 *Counsel for SEB Investment Management AB and*  
8 *Lead Counsel for the Putative Class*